

EXHIBIT A

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

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To: **Monica Williams**
2475 Anthony Circle
Macon, GA 31206

From: **Savannah Local Office**
7391 Hodgson Memorial Drive
Suite 200
Savannah, GA 31406



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

415-2021-00473

Jennifer L. Bessick,
Investigator

(912) 920-4488

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: The EEOC will not proceed further with its investigation, and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

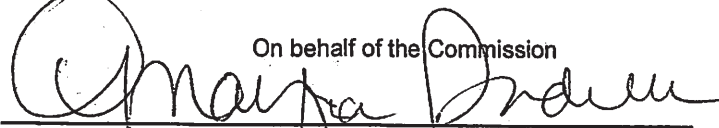
- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



Omayra Padilla,
Director

2/8/21

(Date Issued)

Enclosures(s)

cc: **Suzanne Peterson**
Human Resource Specialist
MORGAN CORPORATION
P.O. Box 3555
Spartanburg, SC 29304

Anitra R. Price, Esq.
ANITRA R. PRICE, P.C
101 Devant Street
Suite 405
Fayetteville, GA 30214

NOTICE OF RIGHTS UNDER THE ADA AMENDMENTS ACT OF 2008 (ADAAA): The ADA was amended, effective January 1, 2009, to broaden the definitions of disability to make it easier for individuals to be covered under the ADA/ADAAA. A disability is still defined as (1) a physical or mental impairment that substantially limits one or more major life activities (actual disability); (2) a record of a substantially limiting impairment; or (3) being regarded as having a disability. *However, these terms are redefined, and it is easier to be covered under the new law.*

If you plan to retain an attorney to assist you with your ADA claim, we recommend that you share this information with your attorney and suggest that he or she consult the amended regulations and appendix, and other ADA related publications, available at http://www.eeoc.gov/laws/types/disability_regulations.cfm.

“Actual” disability or a “record of” a disability (note: if you are pursuing a failure to accommodate claim you must meet the standards for either “actual” or “record of” a disability):

- **The limitations from the impairment no longer have to be severe or significant** for the impairment to be considered substantially limiting.
- In addition to activities such as performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, thinking, concentrating, reading, bending, and communicating (more examples at 29 C.F.R. § 1630.2(i)), **“major life activities” now include the operation of major bodily functions**, such as: functions of the immune system, special sense organs and skin; normal cell growth; and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions; or the operation of an individual organ within a body system.
- **Only one** major life activity need be substantially limited.
- With the exception of ordinary eyeglasses or contact lenses, **the beneficial effects of “mitigating measures”** (e.g., hearing aid, prosthesis, medication, therapy, behavioral modifications) **are not considered** in determining if the impairment substantially limits a major life activity.
- An impairment that is **“episodic”** (e.g., epilepsy, depression, multiple sclerosis) or **“in remission”** (e.g., cancer) is a disability if it **would be substantially limiting when active**.
- An impairment **may be substantially limiting even though** it lasts or is expected to last **fewer than six months**.

“Regarded as” coverage:

- An individual can meet the definition of disability if an **employment action was taken because of an actual or perceived impairment** (e.g., refusal to hire, demotion, placement on involuntary leave, termination, exclusion for failure to meet a qualification standard, harassment, or denial of any other term, condition, or privilege of employment).
- “Regarded as” coverage under the ADAAA no longer requires that an impairment be substantially limiting, or that the employer perceives the impairment to be substantially limiting.
- The employer has a defense against a “regarded as” claim only when the impairment at issue is objectively **BOTH** transitory (lasting or expected to last six months or less) **AND** minor.
- A person is not able to bring a failure to accommodate claim if the individual is covered only under the “regarded as” definition of “disability.”

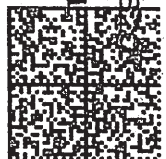
Note: Although the amended ADA states that the definition of disability “shall be construed broadly” and “should not demand extensive analysis,” some courts require specificity in the complaint explaining how an impairment substantially limits a major life activity or what facts indicate the challenged employment action was because of the impairment. Beyond the initial pleading stage, some courts will require specific evidence to establish disability. For more information, consult the amended regulations and appendix, as well as explanatory publications, available at http://www.eeoc.gov/laws/types/disability_regulations.cfm.

Savannah Local Office
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

7391 Hodgson Memorial Drive, Suite 200
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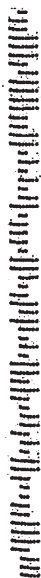
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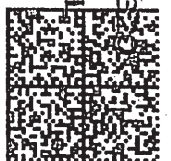
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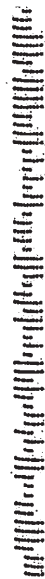


EXHIBIT A

Anitra Price

From: Greminger, Pamela <pamela.greminger@paradigmcorp.com>
Sent: Thursday, November 12, 2020 6:35 PM
To: Anitra Price
Subject: Re: Monica Williams claim 002979-089520-wc-01

Anitra, please note that Ms. Williams is out of work until she returns to the provider to review her MRI report. I communicated this as well to the employer. Let me know if you have any other questions.

Thank you.

Pam

Pamela Greminger RN, CCM
Nurse Case Manager
Working on Behalf of Complex Care Solutions *formerly* ALARIS | Encore and Restore
Paradigm
Phone (912) 270-0755
Fax (855) 573-3365
pamela.greminger@paradigmcorp.com
www.paradigmcorp.com

From: Greminger, Pamela <pamela.greminger@paradigmcorp.com>
Sent: Wednesday, November 11, 2020 2:17 PM
To: Anitra Price <aprice@anitrapriceesqlaw.com>
Subject: Re: Monica Williams claim 002979-089520-wc-01

Hi Anita, I am forwarding ov notes and MRI order from Dr. Roybal's office. I have requested approval and circled back to the adjuster today for status. I'll let you know something asap. Let me know if you have any questions. Thanks!! Pam

Pamela Greminger RN, CCM
Nurse Case Manager
Working on Behalf of Complex Care Solutions *formerly* ALARIS | Encore and Restore
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Fax (855) 573-3365
pamela.greminger@paradigmcorp.com
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From: Greminger, Pamela <pamela.greminger@paradigmcorp.com>
Sent: Friday, October 16, 2020 1:48 PM
To: Anitra Price <aprice@anitrapriceesqlaw.com>
Subject: Re: Monica Williams claim 002979-089520-wc-01

Hi Anita, I will be happy to assist. Am I allowed to contact the client? If not, can you tell me if she speaks English as her primary language? Thanks much, Pam

Pamela Greminger RN, CCM
Nurse Case Manager
Working on Behalf of Complex Care Solutions *formerly* ALARIS | Encore and Restore
Paradigm
Phone (912) 270-0755

From: Anitra Price <aprice@anitrapricesqlaw.com>
Sent: Friday, October 16, 2020 12:12 PM
To: Greminger, Pamela <pamela.greminger@paradigmcorp.com>
Subject: [EXT] RE: Monica Williams claim 002979-089520-wc-01

Caution: This email originated from outside of Paradigm

Thank you Nurse Pam! I really appreciate your response. Ms. Monica is not able to walk normally. Her gait is extremely off. Is there a way you can contact Chatham Orthopedics and ensure that Ms. Monica's injured body parts including her neck, ribs, hip right leg, right foot and ankle are treated. She also had significant headaches and vomiting after the injury for which she went to the ER for.

I look forward to working with you!
Anitra

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From: Greminger, Pamela <pamela.greminger@paradigmcorp.com>
Sent: Thursday, October 15, 2020 6:08 PM
To: Anitra Price <aprice@anitrapricesqlaw.com>
Subject: Monica Williams claim 002979-089520-wc-01

Good afternoon, I have been assigned for medical case management to this client's file. Please send any contact preferences and/or concerns relating to the medical plan of care. My goal is to help with coordination of care and managing any barriers for the client. I'm happy to assist when needed. Thank you, Pam

Pamela Greminger RN, CCM
Nurse Case Manager
Working on Behalf of Complex Care Solutions *formerly* ALARIS | Encore and Restore
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